

DRAFT

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

City of Hartford Department of Housing & Community Development PHA Plans

5 Year Plan for Fiscal Years 2000 - 2004
Annual Plan for Fiscal Year 2000

PHA Plan Agency Identification

PHA Name: City of Hartford
Department of Housing & Community Development

PHA Number: CT-051

PHA Fiscal Year Beginning: (07/2000)

Public Access to Information

Information regarding any activities outlined in this plan can be obtained by contacting:

Main administrative office of the PHA located at the address:

City of Hartford – Department of Housing and Community Development
The Times Building
10 Prospect Street
Hartford, CT 06103-2814
(860) 543-8640

Contract Administrator office located at the following address:

Imagineers
635 Farmington Avenue
Hartford, CT 06105
(860) 247-2318

Display Locations For PHA Plans and Supporting Documents

The PHA Plans (including attachments) are available for public inspection at:

Main administrative office of the PHA located at the address:

City of Hartford – Department of Housing and Community Development
The Times Building
10 Prospect Street
Hartford, CT 06103-2814
(860) 543-8640

Hartford Public Library (Main Office)
500 Main Street
Hartford, CT 06103

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635 Farmington Avenue
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PHA Plan Supporting Documents are available for inspection at: (select all that apply)

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5-YEAR PLAN
PHA FISCAL YEARS 2000 - 2004
[24 CFR Part 903.5]

A. Mission

The primary objective of the City of Hartford Section 8 Tenant Based Assistance, Housing Choice Voucher and Moderate Rehabilitation program is to assist eligible low-income families to obtain decent, safe and sanitary housing. The mission of the City of Hartford, Department of Housing and Community Development is to stabilize and improve the City's housing stock and neighborhoods.

B. Goals

The goals and objectives listed below are derived from HUD's strategic Goals and Objectives and those emphasized in recent legislation.

HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.

PHA Goal: Expand the supply of assisted housing

Objectives:

X Apply for additional rental vouchers.

PHA Goal: Improve the quality of assisted housing

Objectives:

X Obtain high SEMAP score.

X Continue to improve voucher management: (SEMAP score).

X Concentrate on efforts to improve specific management functions: (increase lease up rate percentage, increase supporting data for rent reasonableness determination).

X Promote to program participants' awareness of the dangers of lead poisoning hazards by providing additional handout material during orientation and recertification.

PHA Goal: Increase assisted housing choices

Objectives:

X Provide voucher mobility counseling: (measurable by the number of participants that chose to practice mobility).

X Conduct outreach efforts to potential voucher landlords.

X Review the need to increase the voucher payment standards annually.

X Consider implementing voucher homeownership program when final regulations are published.

HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals

PHA Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

- X Increase the number and percentage of employed persons in assisted families with continued develop of employment goals of family self-sufficiency participants.
- X Attract supportive services to improve assistance recipients' employability with continued program staff support of goals of family self-sufficiency participants.
- X Attract supportive services to increase independence for the elderly or families with disabilities through continued outreach to appropriate support service providers.

HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans

PHA Goal: Ensure equal opportunity and affirmatively further fair housing

Objectives:

- X Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability: (recorded in fair housing documentation).
- X Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability: (recorded in fair housing documentation).
- X Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required: (recorded in fair housing documentation).

Other PHA Goals and Objectives:

PHA Goal: Improve tenant-based assistance program services to better serve program participants.

Objectives:

1. Develop more comprehensive rental survey data to assist in rent reasonableness determinations and need for exception rents or higher payment standards using the following strategies:
 - Routinely review payment standard levels to determine the appropriate level that maximizes both adequate housing choices without reducing total number of rental subsidies.

- Maintain payment standard levels equal to 100% of published fair market rent or greater.
 - Develop rental survey data to review the adequacy of payment standard levels.
 - Track rental information on cases where apartment units became ineligible for program participation due to rent being too high for client. Compile this information and analyze to determine if higher payment standards are necessary (December 31, 2001).
2. Identify additional support services to support family-self sufficiency program efforts by December 31, 2001.
 3. Develop new Section 8 tenant-based assistance homeownership program to support homeownership goals and then advertise to eligible program participants by December 31, 2002.
 4. Maximize enrollment and housing choice opportunities based on funding availability (ongoing).
 5. Develop a more comprehensive listing of handicap accessible units using the following strategies:
 - Assign a specific staff person to coordinate identification and dissemination of known or available handicap accessible units.
 - Identify possible agencies that might have listings of handicapped accessible units.
 - Have program staff identify handicap accessible units through normal program operation and forward information to staff person responsible for maintaining list.
 - Ensure that property owners that list vacant apartments are screened to determine if the units are handicap accessible and if so identify them in that manner.
 - Develop a handicap accessible handout for interested clients with a comprehensive listing of known units (not necessarily vacant).
 6. Continue to make available Section 8 Project Based Assistance:
 - Use 500 Rental Vouchers to attach to specific properties through the Section 8 Project Based Assistance Program to enable owners of these properties to obtain financing for rehabilitation.

Annual PHA Plan PHA Fiscal Year 2000

[24 CFR Part 903.7]

i. Annual Plan Type:

Select which type of Annual Plan the PHA will submit.

☐ **Standard Plan**

☒ **Streamlined Plan:**

☐ **High Performing PHA**

☐ **Small Agency (<250 Public Housing Units)**

☒ **Administering Section 8 Only**

☐ **Troubled Agency Plan**

ii. Executive Summary of the Annual PHA Plan

[24 CFR Part 903.7 9 (r)]

The City of Hartford, Department of Housing and Community Development (DOHCD) Section 8 plan(s) represents an overview of the policies, rules and requirements concerning the Section 8 operations, programs and services. Through this 5-year plan and annual the City of Hartford advises HUD, its program participants and interested parties of its mission for serving the needs of low-income and very low-income families, and the strategy for addressing those needs. The City of Hartford is only required to submit a streamlined plan containing the following information: Housing needs, financial resources, (policies that govern eligibility, selection and admission), rent determination policies, grievance procedures, homeownership programs, community service and self-sufficiency, civil rights certification, and fiscal audit results.

iii. Annual Plan Table of Contents

[24 CFR Part 903.7 9 (r)]

Provide a table of contents for the Annual Plan, including attachments, and a list of supporting documents available for public inspection.

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Attachments

Indicate which attachments are provided by selecting all that apply. Provide the attachment's name (A, B, etc.) in the space to the left of the name of the attachment. Note: If the attachment is provided as a **SEPARATE** file submission from the PHA Plans file, provide the file name in parentheses in the space to the right of the title.

Attachments:

- ☒ Attachment A - Comments of Resident Advisory Board or Boards (file name CT051a01)
- ☒ Attachment B - PHA Plan Certification of Compliance with the PHA Plans and Related Regulations (file name CT051b01)
- ☒ Attachment C - State/Local Government Certification of Consistency with Consolidated Plan (file name CT051c01)
- ☒ Attachment D - Fair Housing Documentation (file name CT051d01)
- ☒ Attachment E - City of Hartford Administrative Plan (file name CT051e01)

Supporting Documents Available for Review

Indicate which documents are available for public review by placing a mark in the "Applicable & On Display" column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions' initiatives to affirmatively further fair housing that require the PHA's involvement.	5 Year and Annual Plans
X	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 rent determination (payment standard) policies <u>X</u> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
X	Section 8 informal review and hearing procedures <u>X</u> check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
X	Policies governing any Section 8 Homeownership program <u>X</u> check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
N/A	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
X	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)

1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

A. Housing Needs of Families in the Jurisdiction/s Served by the PHA

Based upon the information contained in the City of Hartford Consolidated Community Development Plans and other data available to the City of Hartford (DHCD), written below in the following table is a statement of the housing needs in Hartford. In the "Overall" Needs column, is the estimated number of renter families that have housing needs. The remaining characteristics, rate the impact of that factor on the housing needs for each family type, from 1 to 5, with 1 being "no impact" and 5 being "severe impact." N/A is to indicate that no information is available upon which the City of Hartford (DHCD) can make this assessment.

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI (<\$17,900)	16,042	5	4	4	N/A	4	N/A
Income >30% but <=50% of AMI (>\$17,901, <=\$29,800)	8,289	4	3	3	N/A	4	N/A
Income >50% but <80% of AMI (>\$29,801 <=\$47,700)	6,893	3	2	2	N/A	3	N/A
Elderly	12,750	5	4	3	N/A	N/A	N/A
Persons with Disabilities	11,966	5	4	3	5	N/A	N/A
Race 1/Ethnicity 2 White	28,319	N/A	N/A	N/A	N/A	N/A	N/A
Race 2/Ethnicity 2 Black	48,968	N/A	N/A	N/A	N/A	N/A	N/A
Race 3/Ethnicity 2 Asian Pacific	2,066	N/A	N/A	N/A	N/A	N/A	N/A
Race 4/Ethnicity 2 Native Amer./Other	944	N/A	N/A	N/A	N/A	N/A	N/A
Race 1/Ethnicity 1 Hispanic (any race)	50,376	N/A	N/A	N/A	N/A	N/A	N/A

What sources of information did the PHA use to conduct this analysis? (Check all that apply; all materials must be made available for public inspection.)

- ☒ City of Hartford, Hartford Consolidated Community Development Plan 2000
- ☒ U.S. Census data: the Comprehensive Housing Affordability Strategy ("CHAS") dataset1990
- ☒ American Housing Survey data
Indicate year: 1995
- ☒ State of Connecticut Department of Economic and Community Development Analysis of Impediments to Fair Housing Choice.
- ☒ State of Connecticut Department of Economic and Community Development Consolidated Plan. September 1999

- ☒ U.S. Census Fact Finder (1990 data)
- ☒ Planning Department, City of Hartford

B. Housing Needs of Families on the Public Housing and Section 8 Tenant- Based Assistance Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.** PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
<input checked="" type="checkbox"/> Section 8 tenant-based assistance			
<input type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	3,770		480
Extremely low income <=30% AMI	2,676	71%	
Very low income (>30% but <=50% AMI)	829	22%	
Low income (>50% but <80% AMI)	265	7%	
Families with children	2,526	67%	
Elderly families	373	9%	
Families with Disabilities	1,123	28%	
Race1/ethnicity2	264	7%	
Race2/ethnicity2	1,495	40%	
Race4/ethnicity2	37	1%	
Race1/ethnicity1	1,974	52%	

Housing Needs of Families on the Waiting List

Is the waiting list closed (select one)? ☐ No ☒ Yes

If yes:

How long has it been closed (# of months)? 39

Does the PHA expect to reopen the list in the PHA Plan year? ☒ No ☐ Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☒ No ☐ Yes

C. Strategy for Addressing Needs

Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list **IN THE UPCOMING YEAR**, and the Agency's reasons for choosing this strategy.

(1) Strategies

Need: Shortage of affordable housing for all eligible populations

Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:

- ☒ Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- ☒ Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- ☒ Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- ☒ Participate in the Consolidated Plan development process to ensure coordination with broader community strategies

Strategy 2: Increase the number of affordable housing units by:

- ☒ Consider applying for additional section 8 units should they become available.
- ☒ Pursue housing resources other than public housing or Section 8 tenant-based assistance. (Possible examples include State funded housing assistance programs or security deposit funds for eligible recipients).

Need: Specific Family Types: Families at or below 30% of median

Strategy 1: Target available assistance to families at or below 30 % of AMI

- ☒ Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance. The pool of applicant families ensures that the PHA will meet income-targeting requirements.

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

- ☒ Apply for special-purpose vouchers targeted to the elderly, should they become available

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

- ☒ Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- ☒ Affirmatively market to local non-profit agencies that assist families with disabilities

Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:

- ☒ Affirmatively market to races/ethnicities shown to have disproportionate housing needs

Strategy 2: Conduct activities to affirmatively further fair housing

- ☒ Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- ☒ Market the section 8 program to owners outside of areas of poverty /minority concentrations

(2) Reasons for Selecting Strategies

Of the factors listed below, select all that influenced the PHA's selection of the strategies it will pursue:

- ☒ Funding constraints
- ☒ Limited availability of sites for assisted housing
- ☒ Extent to which particular housing needs are met by other organizations in the community
- ☒ Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA

- X Influence of the housing market on PHA programs
- X Community priorities regarding housing assistance
- X Results of consultation with local or state government
- X Results of consultation with residents and the Resident Advisory Board
- X Results of consultation with advocacy groups

2. Statement of Financial Resources

[24 CFR Part 903.7 9 (b)]

List the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year. Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2000 grants)		
a) Public Housing Operating Fund		
b) Public Housing Capital Fund		
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	23,826,363	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)		
g) Resident Opportunity and Self-Sufficiency Grants		
h) Community Development Block Grant		
i) HOME		
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
3. Public Housing Dwelling Rental Income		
4. Other income (list below)		
5. Non-federal sources (list below)		
Total resources	23,826,363	

3. PHA Policies Governing Eligibility, Selection, and Admissions

[24 CFR Part 903.7 9 (c)]

A. Public Housing (N/A)

Exemptions: PHAs that do not administer public housing are not required to complete subcomponent 3A.

B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B.

Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).

(1) Eligibility

a. What is the extent of screening conducted by the PHA?

- ☒ Screening for income eligibility.
- ☒ Criminal or drug-related activity only to the extent required by law or regulation.

b. The PHA does not request criminal records from local law enforcement agencies for screening purposes.

- c. The PHA does not request criminal records from State law enforcement agencies for screening purposes.
- d. The PHA does not access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source).
- e. Indicate what kinds of information you share with prospective landlords?

Information is provided to prospective owners regarding participating families in the following manner; upon request the PHA gives prospective owners the family's current address and if known, the name and address of the owner at the family's current and prior address.

The PHA may also provide any tenancy history that involves eviction action initiated against the family. Or information pertaining to damage, vacancy and unpaid rent claims paid out on behalf of the family.

(2) Waiting List Organization

- a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged?

☒ None

- b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)

☒ Contract Administrator office located at the following address:

Imagineers
635 Farmington Avenue
Hartford, CT 06105

(3) Search Time

- a. ☒ Yes ☐ No: Does the PHA give extensions on standard 60-day period to search for a unit?

If yes, state circumstances below:

Difficulties encountered in obtaining or locating decent and safe housing. (See Administrative Plan for policies pertaining to this issue.)

(4) Admissions Preferences

a. Income targeting

- ☐ Yes ☒ No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the section 8 program to families at or below 30% of median area income?

b. Preferences

1. ☒ Yes ☐ No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application) (if no, skip to subcomponent **(5) Special purpose section 8 assistance programs**)
2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Preferences

- ☒ Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition, Victims of Domestic Violence)
- ☒ Substandard housing
- ☒ High rent burden (rent is > 50 percent of income)
- ☒ Medical Category - Disabled or Handicapped family members(disabled or handicapped as defined in Section 223 of the Social Security Act)
- ☒ Elderly Person

3. If the PHA will employ admissions preferences, please prioritize by placing a "1" in the space that represents your first priority, a "2" in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use "1" more than once, "2" more than once, etc.

1 Date and Time

Preferences

1 At least two of the following preferences: (Involuntary Displacement, Substandard Housing, High Rent Burden)

- 1 At least one of the following preferences: (Involuntary Displacement, Substandard Housing, High Rent Burden) and one of following preferences (Elderly, or Medical Category - Disabled or Handicapped family members)
- 2 Involuntary Displacement
- 2 Substandard housing
- 2 High rent burden
- 3 Medical Category - Disabled or Handicapped family members (disabled or handicapped as defined in Section 223 of the Social Security Act) or family members with a severe medical problem (such as heart disease, cancer, HIV positive).
- 3 Elderly Person
- 4 No Preference

4. Among applicants on the waiting list with equal preference status, how are applicants selected? (select one)

- X Date and time of application
- Drawing (lottery) or other random choice technique

5. If the PHA plans to employ preferences for “residents who live and/or work in the jurisdiction” (select one) N/A

- This preference has previously been reviewed and approved by HUD
- X The PHA requests approval for this preference through this PHA Plan

6. Relationship of preferences to income targeting requirements: (select one)

- The PHA applies preferences within income tiers
- X Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Special Purpose Section 8 Assistance Programs

a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained? (select all that apply)

- X The Section 8 Administrative Plan
- X Briefing sessions and written materials

b. How does the PHA announce the availability of any special-purpose section 8 programs to the public?

- Through published notices

☒ Other (Housing Voucher Family Self-Sufficiency program was advertised to all waiting list applicants and current program participants).

4. PHA Rent Determination Policies

[24 CFR Part 903.7 9 (d)]

A. Public Housing N/A

Exemptions: PHAs that do not administer public housing are not required to complete sub-component 4A.

B. Section 8 Tenant-Based Assistance

Exemptions: PHAs that do not administer Section 8 tenant-based assistance are not required to complete sub-component 4B. **Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

(1) Payment Standards

Describe the voucher payment standards and policies.

a. What is the PHA's payment standard? (select the category that best describes your standard)

- ☐ At or above 90% but below 100% of FMR
- ☒ 100% of FMR
- ☐ Above 100% but at or below 110% of FMR
- ☐ Above 110% of FMR (if HUD approved; describe circumstances below)

b. If the payment standard is lower than FMR, why has the PHA selected this standard? (select all that apply)

- ☐ FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
- ☐ The PHA has chosen to serve additional families by lowering the payment standard
- ☐ Reflects market or submarket
- ☐ Other (list below)

c. If the payment standard is higher than FMR, why has the PHA chosen this level? (select all that apply)

- ☐ FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
- ☐ Reflects market or submarket
- ☐ To increase housing options for families

– Other (list below)

d. How often are payment standards reevaluated for adequacy? (select one)

☒ Annually

– Other (list below)

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard? (select all that apply)

☒ Success rates of assisted families

☒ Rent burdens of assisted families

☒ Other (list below)

(2) Minimum Rent

a. What amount best reflects the PHA's minimum rent? (select one)

☒ \$0

– \$1-\$25

– \$26-\$50

b. ☐ Yes ☒ No: Has the PHA adopted any discretionary minimum rent hardship exemption policies? The PHA has followed the requirements outlined as follows:

(QHWRA established certain exemptions to the minimum rent requirements for hardship circumstances. Section 3(a)(3)(B) of the USHA generally states that financial hardship includes the following situations: (1) the family has lost eligibility determinations for a Federal, State, or local assistance program; (2) the family would be evicted as a result of the imposition of the minimum rent requirement; (3) the income of the family has decreased because of changed circumstances, including loss of employment; (4) a death in the family has occurred; and (5) other circumstances determined by the PHA or HUD.)

5. Operations and Management

[24 CFR Part 903.7 9 (e)]

Exemptions from Component 5: High performing and small PHAs are not required to complete this section. Section 8 only PHAs must complete parts A, B, and C(2)

A. PHA Management Structure

Describe the PHA's management structure and organization.

(select one)

- An organization chart showing the PHA's management structure and organization is attached. (See Attachment A and B)
- X A brief description of the management structure and organization of the PHA follows:

The City of Hartford Department of Housing and Community Development is the Public Housing Agency. City of Hartford Department of Housing and Community Development staff oversees the contractors administration of the Section 8 Program. The contractor prepares an annual program budget and submits it for the PHA manager's review and approval. It is then forwarded to HUD for approval. The contractor prepares all documents necessary to requisition approved program funds from HUD to the City of Hartford (DOHCD).

The contractors program staff handles all inquires about eligibility, maintains a waiting list, enrolls and orients new participants, verifies tenant income, calculates tenant rent and housing assistance payments, inspects apartment under consideration for subsidy, solves problems which arise between tenants and landlords, and processes and mails rental subsidy payments. The contractor has 26 employees that work on the program on either full time or part-time basis. The City of Hartford Administrative Plan and Program Controls (see Attachment E) also provides further discussion regarding the management structure and the organization of the PHA.

B. HUD Programs Under PHA Management

List Federal programs administered by the PHA, number of families served at the beginning of the upcoming fiscal year, and expected turnover in each. (Use "NA" to indicate that the PHA does not operate any of the programs listed below.)

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	NA	NA
Section 8 Vouchers	2731	207
Section 8 Certificates	677	51
Section 8 Mod Rehab	539	96
Special Purpose Section 8 Certificates/Vouchers (list individually)	NA	NA
Public Housing Drug Elimination Program (PHDEP)	NA	NA

Other Federal Programs(list individually)	NA	NA

C. Management and Maintenance Policies

List the PHA's public housing management and maintenance policy documents, manuals and handbooks that contain the Agency's rules, standards, and policies that govern maintenance and management of public housing, including a description of any measures necessary for the prevention or eradication of pest infestation (which includes cockroach infestation) and the policies governing Section 8 management.

(1) Public Housing Maintenance and Management: (N/A)

(2) Section 8 Management: (list below)

City of Hartford, Section 8 and Housing Voucher Administrative Plan

6. PHA Grievance Procedures

[24 CFR Part 903.7 9 (f)]

Exemptions from component 6: High performing PHAs are not required to complete component 6. Section 8-Only PHAs are exempt from sub-component 6A.

A. Public Housing (N/A)

B. Section 8 Tenant-Based Assistance

1. ☒ Yes ☐ No: Has the PHA established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982?

If yes, list additions to federal requirements below:

None

2. Which PHA office should applicants or assisted families contact to initiate the informal review and informal hearing processes? (select all that apply)

Other: Contract Administrator office located at the following address:

Imagineers
635 Farmington Avenue
Hartford, CT 06105
(860) 247-2318

7. Capital Improvement Needs

[24 CFR Part 903.7 9 (g)]

Exemptions from Component 7: Section 8 only PHAs are not required to complete this component and may skip to Component 8.

(N/A)

B. HOPE VI and Public Housing Development and Replacement Activities (Non-Capital Fund)

(N/A)

8. Demolition and Disposition

[24 CFR Part 903.7 9 (h)]

Applicability of component 8: Section 8 only PHAs are not required to complete this section.

(N/A)

9. Designation of Public Housing for Occupancy by Elderly Families or Families with Disabilities or Elderly Families and Families with Disabilities

[24 CFR Part 903.7 9 (i)]

Exemptions from Component 9; Section 8 only PHAs are not required to complete this section.

(N/A)

10. Conversion of Public Housing to Tenant-Based Assistance

[24 CFR Part 903.7 9 (j)]

Exemptions from Component 10; Section 8 only PHAs are not required to complete this section.

A. Assessments of Reasonable Revitalization Pursuant to section 202 of the HUD FY 1996 HUD Appropriations Act

(N/A)

B. Reserved for Conversions pursuant to Section 22 of the U.S. Housing Act of 1937

C. Reserved for Conversions pursuant to Section 33 of the U.S. Housing Act of 1937

11. Homeownership Programs Administered by the PHA

[24 CFR Part 903.7 9 (k)]

A. Public Housing

Exemptions from Component 11A: Section 8 only PHAs are not required to complete 11A.

(N/A)

B. Section 8 Tenant Based Assistance

1. ☒ Yes ☐ No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982 ? (If “No”, skip to component 12; if “yes”, describe each program using the table below (copy and complete questions for each program identified), unless the PHA is eligible to complete a streamlined submission due to high performer status. High performing PHAs may skip to component 12.)

2. Program Description: Section 8 Homeownership
(Program description, size of program, eligibility criteria and program design will be developed once final regulations have been issued and reviewed).

a. Size of Program *(To be determined)*

☐ Yes ☐ No: Will the PHA limit the number of families participating in the section 8 homeownership option?

If the answer to the question above was yes, which statement best describes the number of participants? (select one)

- ☐ 25 or fewer participants
- ☐ 26 - 50 participants
- ☐ 51 to 100 participants
- ☐ more than 100 participants

b. PHA-established eligibility criteria(*To be determined*)

☐ Yes ☐ No: Will the PHA's program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria?
If yes, list criteria below:

12. PHA Community Service and Self-sufficiency Programs

[24 CFR Part 903.7 9 (l)]

Exemptions from Component 12: High performing and small PHAs are not required to complete this component. Section 8-Only PHAs are not required to complete sub-component C.

A. PHA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

☐ Yes ☒ No: Has the PHA has entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937)?

If yes, what was the date that agreement was signed? DD/MM/YY

2. Other coordination efforts between the PHA and TANF agency (select all that apply)

- ☒ Client referrals
- ☒ Information sharing regarding mutual clients (for rent determinations and otherwise)
- ☒ Coordinate the provision of specific social and self-sufficiency services and programs to eligible families
- ☐ Jointly administer programs
- ☐ Partner to administer a HUD Welfare-to-Work voucher program
- ☐ Joint administration of other demonstration program
- ☐ Other (describe)

B. Services and programs offered to residents and participants

(1) General

a. Self-Sufficiency Policies

Which, if any of the following discretionary policies will the PHA employ to enhance the economic and social self-sufficiency of assisted families in the following areas? (select all that apply)

- ☒ **NA** Public housing rent determination policies
- ☒ **NA** Public housing admissions policies
- ☐ Section 8 admissions policies
- ☒ **NA** Preference in admission to section 8 for certain public housing families

- Preferences for families working or engaging in training or education programs for non-housing programs operated or coordinated by the PHA
- NA** Preference/eligibility for public housing homeownership option participation
- Preference/eligibility for section 8 homeownership option participation
- Other policies (list below)

b. Economic and Social self-sufficiency programs

XYes _ No: Does the PHA coordinate, promote or provide any programs to enhance the economic and social self-sufficiency of residents? (If “yes”, complete the following table; if “no” skip to sub-component 2, Family Self Sufficiency Programs. The position of the table may be altered to facilitate its use.)

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
Homeownership workshops	45		PHA/Urban League	Section 8
Employment Advocacy	16		PHA	Section 8
Homeownership referral	6		PHA	Section 8
Educational Workshop	10		PHA/State Community College	Section 8

(2) Family Self Sufficiency program/s

a. Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants (start of FY 2000 Estimate)	Actual Number of Participants (As of: 01/01/00)
Public Housing	NA	NA
Section 8	55	43 (current program participants) 7 (successful left with escrow) 6 (terminated from program) 56 *

b. Yes No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps the PHA plans to take to achieve at least the minimum program size? (N/A)

If no, list steps the PHA will take below:

We are in the process of soliciting current program participants for participation. During annual recertification program participants are advised about the FFS program through a written handout and offered an opportunity to participate. Program participants that enter the program are also offered the opportunity to participate but not required.

C. Welfare Benefit Reductions

1. The PHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by: (select all that apply)

NA Adopting appropriate changes to the PHA's public housing rent determination policies and train staff to carry out those policies

X Informing residents of new policy on admission and reexamination

NA Actively notifying residents of new policy at times in addition to admission and reexamination.

X Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services

X Establishing a protocol for exchange of information with all appropriate TANF agencies

– Other: (list below)

D. Reserved for Community Service Requirement pursuant to section 12(c) of the U.S. Housing Act of 1937

13. PHA Safety and Crime Prevention Measures

[24 CFR Part 903.7 9 (m)]

Exemptions from Component 13: High performing and small PHAs not participating in PHDEP and Section 8 Only PHAs may skip to component 15. High Performing and small PHAs that are participating in PHDEP and are submitting a PHDEP Plan with this PHA Plan may skip to sub-component D.

(N/A)

14. RESERVED FOR PET POLICY

[24 CFR Part 903.7 9 (n)]

(N/A)

15. Civil Rights Certifications

[24 CFR Part 903.7 9 (o)]

Civil rights certifications are included in the PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations.

16. Fiscal Audit

[24 CFR Part 903.7 9 (p)]

1. ☒ Yes ☐ No: Is the PHA required to have an audit conducted under section. 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))?

(If no, skip to component 17.)

2. ☒ Yes ☐ No: Was the most recent fiscal audit submitted to HUD?

3. ☐ Yes ☒ No: Were there any findings as the result of that audit?

4. ☐ Yes ☐ No: If there were any findings, do any remain unresolved?
If yes, how many unresolved findings remain? _____

5. ☐ Yes ☐ No: Have responses to any unresolved findings been submitted to HUD?
If not, when are they due (state below)?

17. PHA Asset Management

[24 CFR Part 903.7 9 (q)]

Exemptions from component 17: Section 8 Only PHAs are not required to complete this component. High performing and small PHAs are not required to complete this component.

(N/A)

18. Other Information

[24 CFR Part 903.7 9 (r)]

A. Resident Advisory Board Recommendations

1. ☒ Yes ☐ No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?

2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)

☒ Attached as Attachment A (File name CT051a01)

☐ Provided below:

3. In what manner did the PHA address those comments? (select all that apply)

☐ Considered comments, but determined that no changes to the PHA Plan were necessary.

- ☐ The PHA changed portions of the PHA Plan in response to comments
List changes below:
- ☒ Other: (list below)
Resident comments are under review and final changes will be considered
after public hearing.

B. Description of Election process for Residents on the PHA Board

1. ☒ Yes ☐ No: Does the PHA meet the exemption criteria provided section 2(b)(2) of the U.S. Housing Act of 1937? (If no, continue to question 2; if yes, skip to sub-component C.) The PHA has no public housing units. A PHA that has no public housing units, but administers Section 8 tenant-based assistance, is eligible for the exception, regardless of the number of Section 8 vouchers it administers.

2. ☐ Yes ☐ No: Was the resident who serves on the PHA Board elected by the residents? (If yes, continue to question 3; if no, skip to sub-component C.) (N/A)

3. Description of Resident Election Process (N/A)

a. Nomination of candidates for place on the ballot: (select all that apply)

- ☐ Candidates were nominated by resident and assisted family organizations
☐ Candidates could be nominated by any adult recipient of PHA assistance
☐ Self-nomination: Candidates registered with the PHA and requested a place on ballot
☐ Other: (describe)

b. Eligible candidates: (select one)

- ☐ Any recipient of PHA assistance
☐ Any head of household receiving PHA assistance
☐ Any adult recipient of PHA assistance
☐ Any adult member of a resident or assisted family organization
☐ Other (list)

c. Eligible voters: (select all that apply)

- ☐ All adult recipients of PHA assistance (public housing and section 8 tenant-based assistance)
☐ Representatives of all PHA resident and assisted family organizations
☐ Other (list)

C. Statement of Consistency with the Consolidated Plan

For each applicable Consolidated Plan, make the following statement (copy questions as many times as necessary).

1. Consolidated Plan jurisdiction: (City of Hartford)

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
1. Increase the availability of decent affordable housing by expanding the supply of assisted housing through application for additional vouchers.
 2. Increase the availability of decent affordable housing by increasing assisted housing choice through mobility counseling and outreach efforts to potential landlords.
 3. Promoting self-sufficiency and asset development of families and individuals through family self-sufficiency program efforts.
 4. Ensuring equal opportunity and affirmatively further fair housing through analysis of impediments to fair housing choice.
 5. Assisting families to move from renting to homeownership by developing new Section 8 homeownership program.

— Other: (list below)

3. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments:
Through the overall goals and programmatic initiatives identified in the Hartford Consolidated Plan.

D. Other Information Required by HUD

Use this section to provide any additional information requested by HUD.

Attachments

Attachment A	Comments of Resident Advisory Board or Boards
Attachment B	PHA Plan Certification of Compliance with the PHA Plans and Related Regulations
Attachment C	State/Local Government Certification of Consistency with Consolidated Plan
Attachment D	Fair Housing Documentation
Attachment E	City of Hartford Tenant Based Assistance Administrative Plan

**PHA Plan
Table Library**

Attachment A

Comments of Resident Advisory Board

The Resident Advisory Board held a meeting February 17, 2000 and February 23, 2000 to review the City of Hartford Department of Housing & Community Development 5-year and Annual Plan with the purpose of making comments and or recommendations. What follows is a list of comments or recommendations made by the Resident Advisory Board. The Resident Advisory Board plans to continue to stay in place and meet during the coming year.

The following comments were expressed during resident advisory board meetings:

- Support for the preference categories and the ranking system for the Section 8 waiting list.
- Goals should include increasing housing options or housing choices for Section 8 program participants.
- Empower participants to be able to leave program to keep waiting list moving.
- Support homeownership initiatives.
- Create incentives and penalties to motivate participants to leave program.
- Comment in support of Family Self-Sufficiency program, especially with State welfare 21-month limit.
- Agree with ranking method of preferences for the Section 8 waiting list.
- Would like to see waiting list more mobile or move faster.
- Program could stand to be more rigid to allow more mobility.
- Should set minimum amount of rent regardless of income-level for accountability.
- Should not require minimum amount of rent considering exemption categories.
- Need more funding to help more families.

The following comments were submitted in writing:

- More programs that will help people / tenants to get off Section 8, so others will a chance.

- I feel very fortunate to have help from the City of Hartford who helps me with Section 8. The City of Hartford Section 8 program has helped me live more independently.
- Landlords are not getting repairs done quick enough.
- After reviewing the Section 8 Assistance Plan, I have a few comments/questions: I would like to say that it is a very good plan that covers all needs and goals for housing. Why is the tenant required to pay such a large security deposit? 2. Is Section 8 responsible for damage to the apartment? Can the tenant be made to pay? Taken to court? How does this work?
- No comments at this time.

The Resident Advisory Board was developed using the following method. A mailing was conducted to forty current program participants to solicit interest in reviewing the 5-year and Annual Plans. The mailing included the draft 5-year and Annual Plan, a survey response form, a self-addressed stamp envelope and a cover letter. The mailing invited program participants to serve on a resident advisory board and/or make comments or recommendations on the draft 5-year and Annual Plan.

The program participants invited to participate on the Resident Advisory Board were randomly selected by program staff and other program participants and were done in a manner to adequately reflect and represent a cross-section of the tenants assisted by the Section 8 Program. A statistical summary of the individuals is provided in the following tables:

Income Status	Number of Participants
Household Income <= 30% AMI	23
Household Income >= 30% AMI	16
Household Income >= 50% AMI	1

Family Status	Number of Participants
Elderly	3
Disabled	8
Family	29

Race/Ethnicity	Number of Participants
Race 1/Ethnicity 2	4
Race 2/Ethnicity 2	19
Race 1/Ethnicity 1	17

Type of Program	Number of Participants
Section 8 Certificate	17
Housing Voucher	18
Projected-Based	5

In addition to the above stated efforts, 500 clients were randomly selected and mailed an invitation to make comments or recommendations on the draft 5-year and Annual Plan and to also consider serving on the resident advisory board. A notice was also posted in the main lobby of the contract administrator office to advertise that opportunity to review and comment on the 5-year and annual plan.

The comments that are received will be collected prior to the public hearing and added to the comments already provided. This additional effort was undertaken to further increase client participation in the review process of the 5 year and Annual plan.

**Reserved for
Certification by Local Official of PHA Plans Consistency with
The Consolidated Plan**

**Reserved for
PHA Certification of Compliance with the PHA Plans
And Related Regulations**

MEETING REPORT: 1

DATE: August 17, 1999

TOPIC: Analysis of Impediments to Fair Housing Choice

ATTENDING:

K. Schultz	Director, Program Management
S. Butler	Assistant Director
V. Ithier	Assistant Director
M. Santos	Executive Assistant

Meeting Record: A meeting was conducted between the above personnel to discuss issues relating to impediments of fair housing choice in the Tenant Based Section 8 Program. This action was initiated in response to new requirements outlined in Section 982.53 (c) of the Federal Regulations. The new equal opportunity requirements obligate housing agencies to affirmatively further fair housing in the programs that it administers. This meeting report constitutes the initial meeting on this issue and a commitment to document the continuation of this analysis and action taken as a result of this review. Member(s) of the resident advisory board will be included in future analysis and review of the impediments of fair housing choice in the Tenant Based Section 8 Program. This memo constitutes a summary of topics discussed and/or conclusions reached at this meeting.

What follows is an analysis of impediments to fair housing choice for the Tenant-Based Section 8 Program and specific action outlined to address those impediments. (This analysis was guided by staff review of program records and program experience, as well as, information provided in the State of Connecticut Department of Economic and Community Development Analysis of Impediments to Fair Housing Choice):

Analysis of impediments to fair housing choice for the Tenant-Based Section 8 Program

1. Listing of handicap accessible units to interested clients is sometimes insufficient.

Develop a more comprehensive listing of handicap accessible units using the following strategies:

- Assign a specific staff person to coordinate identification and dissemination of known or available handicap accessible units.
- Identify possible agencies that might have listings of handicapped accessible units.
- Have program staff identify handicap accessible units through normal program operation and forward information to staff person responsible for maintaining list.
- Ensure that property owners that list vacant apartments are screened to determine if the units are handicap accessible and if so identify them in that manner.

- Develop a handicap accessible handout for interested clients with a comprehensive listing of known units (not necessarily vacant).

2. Program staff could benefit from ongoing training regarding fair housing laws and responsibilities.

Continue to ensure that program staff is properly trained regarding fair housing laws and responsibilities using the following strategies:

- Identify fair housing agencies offering fair housing training and orientation for program staff.
- Continue to gather information from organizations and agencies involved with fair housing and distribute to program staff to program participants.
- Reserve time at regularly scheduled program staff meetings to discuss fair housing issues.
- Ensure adequate fair housing training for program staff by attending fair housing seminars.

3. If payment standard is not set at a high enough rate then it limits the number of housing choices for program participants.

Routinely review payment standard levels to determine the appropriate level that maximizes both adequate housing choices without reducing total number of rental subsidies using the following strategies:

- Maintain payment standard levels equal to 100% of published fair market rent or greater.
- Develop rental survey data to review the adequacy of payment standard levels.
- Track rental information on cases where apartment units became ineligible for program participation due to rent being too high for client. Compile this information and analyze to determine if higher payment standards are necessary.

4. Program Participants don't always report housing discrimination that they may encounter or are unwilling to take further action when they do report housing discrimination (they may complain about encountering discrimination but are unwilling to take action).

Develop further strategies to ensure program participants consider reporting housing discrimination and are properly informed regarding their rights under fair housing laws using the following strategies:

- Ensure that updated fair housing material is provided to program participants during orientation.
- Develop office procedures to have program staff record basic facts surrounding any reported incident of housing discrimination (whether further action was taken or not taken).
- Develop a system to maintain a central file where reported incidents of housing discrimination are gathered and review routinely to identify patterns or possible follow-up action.

5. Improved fair housing complaint process including a full understanding of appropriate complaint referral procedures.

Develop further strategies to improve the fair housing complaint process and referral procedures:

- Assign a specific staff person to coordinate fair housing activities.
- Develop a formal process for referring fair housing complaints to appropriate agencies.
- Commit to conducting an analysis of the impediments to fair housing choice on an annual basis and include member(s) of the resident advisory board in the process.

6. The general lack of affordable rental units in the market creates impediments to fair housing choice, particularly for those families searching for larger size apartment units.

Develop strategies to counteract the general lack of affordable rental units for families searching for larger size units:

- Affirmatively market the Section 8 tenant based program to local landlords to dissemination of information to local landlords.

Fair Housing Action Points

		Target Date	Person Respon.
1.	· Coordinate identification and dissemination of known or available handicap accessible units and maintain in ongoing file.	Ongoing	SMB
2.	· Identify possible agencies that might have listings of handicapped accessible units.	2/28/00	SMB
3.	· Have program staff identify handicap accessible units through normal program operation and forward information to staff person responsible for maintaining list. · Announce at staff meetings.	Ongoing 2/28/00	SMB SMB
4.	· Ensure that property owners that list vacant apartments are screened to determine if the units are handicap accessible and if so identify them in that manner. · Maria remind support staff	Ongoing	MS
5.	· Develop a handicap accessible handout for interested clients with a comprehensive listing of known units (not necessarily vacant).	2/18/00	SMB
6.	Ongoing Staff Training Action Points · Annually devote one staff meeting to fair housing training from outside source. · Add "fair housing discussion" to regular staff meeting agenda, also use time to distribute fair housing material. · Search fair housing training seminars for staff to attend.	4/18/00 2/18/00 ongoing	SMB SMB SMB
7.	· Conduct needs assessment and self-evaluations on a ongoing basis but at least annually (every January) · Include participation of resident advisory board · Review State of Connecticut analysis of impediments to fair housing choice	1/31/01 1/31/01 1/31/01	SMB SMB SMB
8.	· Develop rental survey data. · Track rental information on cases where apartment units became ineligible for program participation due to rent being too high for client. Compile this information and analyze to determine if higher payment standards are necessary.(Announce at staff meeting)	5/1/00 ongoing	VI SMB
9.	· Continue to review additional fair housing handout information to consider handing out or making available to program participants. · Develop a form to provide to program staff to record basic facts surrounding any	Ongoing 4/18/00	SMB SMB

	<p>reported incident of housing discrimination (whether further action was taken or not taken). (Discuss with staff at staff meeting).</p> <ul style="list-style-type: none"> · Develop a file to maintain reported incidents of housing discrimination are gathered and review routinely to identify patterns or possible follow-up action. 	4/18/00	SMB
10.	<ul style="list-style-type: none"> · Develop a formal process for referring fair housing complaints to appropriate agencies. · Develop written handout to staff and clients explaining various options. 	5/18/00 5/18/00	SMB SMB/KS
11.	<ul style="list-style-type: none"> · Develop system to flag clients due for recertification who are disabled or handicap who have requested a home-visit. 	2/28/00	SMB
12.	<ul style="list-style-type: none"> · Research 24CFR 8.4, 8.24, 8.23(b)(1) and 8.33 "PHA to pay for modifications?" 	2/28/00	KS/SMB

ADMINISTRATIVE PLAN

HOUSING CHOICE VOUCHER PROGRAM

**CITY OF HARTFORD
DEPARTMENT OF HOUSING &
COMMUNITY DEVELOPMENT**

JANUARY 2000

I N D E X

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SECTION I. APPLICABILITY AND SCOPE

A. Mission Statement

The primary objective of the City of Hartford Section 8 Tenant Based Assistance, Housing Choice Voucher program is to assist eligible low-income families to obtain decent, safe and sanitary housing. The mission of the City of Hartford Department of Housing and Community Development through the its Section 8 program is to promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.

B. General

The Department of Housing and Community Development is the designated Housing Agency (HA) for the City of Hartford. The HA has contracted for the preparation and submission of Section 8 Housing Assistance funding applications and for the administration and enforcement of these programs. The HA's contractor is Imagineers, LLC. (hereinafter be referred to as "the Contractor").

The City of Hartford recognizes the housing needs of its low and moderate income residents. The Section 8 Tenant Based Assistance, Housing Choice Voucher program are a responsive mechanism for providing immediate housing assistance for low and very-low income households. The rental subsidy enables tenants to afford standard units while providing rental income sufficient to meet the operating expenses of the landlords.

The Contractor prepares for HA review and approval all necessary annual budgets, revisions, increments, and quarterly requisitions required by HUD. The Contractor processes monthly Housing Assistance Payments requisitions through the HA. The Contractor submits financial audits and management reports as required by the HA or Housing and Urban Development (HUD) office. The Contractor makes available for review at any time all program financial records. The Contractor maintains a financial system designed to comply with HUD issuances HM75-32 and the applicable section of the "Low-Rent Housing Accounting Handbook" 7501.1 as well as other directives of HUD and the HA.

In addition to the reports required from the HA by HUD, the Contractor provides monthly program activity reports to the HA. More frequent and additional reports can be provided as requested by the HA. Special reports required by HUD will be prepared and additional requests will be met as directed by the HA.

The policies and procedures contained herein are applicable to implementation of housing

assistance payments on behalf of eligible families by leasing existing housing pursuant to the provisions of Section 8 of the U.S. Housing Act of 1937.

C. Equal Opportunity Statement

The HA and its Contractor will comply with the Fair Housing Act, Title VI of the Civil Rights Act of 1964, the Age Discrimination Act of 1975, Executive Order 11063, Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act and all related rules, regulations, and requirements.

The HA and its Contractor will not on account of race, color, creed, national origin, sex, handicap, or familial status deny to any family the opportunity to apply for admission nor deny an eligible applicant the opportunity to lease or rent a dwelling unit; if suitable to its needs. In the selection of families, there will be no discrimination against families otherwise eligible for admission because their income is derived in whole or in part from public assistance.

SECTION II. PLANS FOR THE ADMINISTRATION OF PROGRAM FUNCTIONS

The overall administrative approach includes an accessible Contractor office suitable to accommodate client households and other interested parties, in the performance of all tasks required by the Section 8 regulations.

The Contractor provides the following program services as specified by HUD for proper administration of Section 8 Tenant Based Assistance, Housing Choice Voucher program.

A. Outreach to Families and Contact with Owners

The Contractor utilizes a variety of means to publicize and disseminate information regarding the Section 8 Tenant Based Assistance, Housing Choice Voucher program for income-eligible households. Aside from the conventional print and broadcast media, the Contractor meets with community organizations, owner and renter associations, block groups, neighborhood planning and development committees, housing advocates, governmental departments, advocacy agencies, and church groups. The Contractor will use its management experience and capabilities to disseminate useful relevant information to the widest audience.

The Contractor also recognizes that special outreach may be necessary to assist the following: families suffering a language barrier, disabled or handicapped persons, and the

very low income, or very large families.

B. Taking Applications and Suspension of Taking Preliminary Applications

All applicants will be required to complete an application form, which will contain information necessary for the Contractor to determine whether the applicant is eligible. Incomplete applications will not be taken.

When the number of families on the HA waiting list is such that there is no reasonable prospect that additional applicants could receive assistance within a reasonable time period, the Contractor may suspend the taking of applications.

The decision to open or close the waiting list will be based on whether the existing waiting list contains an adequate pool of applicants for the use of available program funding.

When a determination is made that the waiting list needs to be opened or closed to new applicants, the Contractor will give proper public notice before such action is taken. The public notice will be by publication in a local newspaper of general circulation, and also by minority media and other suitable means. The notice will comply with HUD fair housing requirements.

C. Application Processing

1. Completion of Application

When Applications are taken in person and filled out by program staff during normal business hours (Monday-Friday, 8:00 a.m. to 5:00 p.m.). Applications are not prepared by telephone or received by mail unless it is necessary to accommodate an individual applicant's disability. Occasionally, Contractor staff will be sent to the home of the applicant in order to accept an application. Handouts are made available to potential applicants to explain how to apply. Verbal instructions are also provided.

For purposes of applying "family" is defined to include but is not limited to, an elderly person (at least 62 years old or older), the remaining family member of a tenant family, and a displaced person. For purposes of applying "continuously assisted" is defined as an applicant who is continuously assisted under the 1937 Housing Act if the family is already receiving assistance under any 1937 Housing Act program when the family is admitted to the voucher program.

2. Determination of Eligibility

An applicant shall be determined eligible if the applicant:

- a. Has income not exceeding the applicable Section 8 very-low income limits;

- b. Has not committed fraud or misrepresentation in connection with any Federally assisted housing program;
- c. Does not owe rent or other amounts to the HA or any public housing in connection with Section 8 or public housing assistance under the U.S. Housing Act of 1937;
- d. Has reimbursed the HA or any public housing authority for any amounts paid to an Owner;
- e. Has not previously violated the Family Obligations in 24 GFR 982.551, and
- f. Head of household or oldest family member is at least 18 years old or emancipated.

Applicant data is maintained on the initial application form, which is pre-printed, in numerical sequence. Waiting list reports maintain data in several different manners including; chronological order by date of application and level of priority; numerical sequence by pre-printed numbers on application form; and alphabetical by applicant's last name.

The Contractor reserves the right to screen applicants for criminal or drug-related activity during the intake process if information or allegations are brought to the Contractor's attention. Ultimately the owner is responsible for screening the applicants' suitability for tenancy.

3. Maintenance of the Waiting List and Selection of Families

There is only one waiting list for all applicants regardless of the bedroom size the applicant may need. Each applicant shall be assigned an appropriate place on the waiting list in sequence based upon the date and time of application, as well as the following preference factors:

Identification of Preferences:

- a) Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition, Victims of Domestic Violence)
- b) Substandard housing
- c) High rent burden (rent is > 50 percent of income)
- d) Medical Category - Disabled or Handicapped family members (disabled or handicapped as defined in Section 223 of the Social Security Act)
- e) Elderly Person

Ranking of the Preferences:

Ranking preferences are identified below by the numeric value next to the preference

category (example: a “1” in the space that represents the first priority, a “2” in the box representing the second priority, and so on.) If equal weight is given to one or more of these choices the same number will be next to both.

Preferences

- 1 At least two of the following preferences: (Involuntary Displacement, Substandard Housing, High Rent Burden)
- 1 At least one of the following preferences: (Involuntary Displacement, Substandard Housing, High Rent Burden) and one of following preferences (Elderly, or Medical Category - Disabled or Handicapped family members)
- 2 Involuntary Displacement
- 2 Substandard housing
- 2 High rent burden
- 3 Medical Category - Disabled or Handicapped family members (disabled or handicapped as defined in Section 223 of the Social Security Act) or family members with a severe medical problem (such as heart disease, cancer, HIV positive).
- 3 Elderly Person
- 4 No Preference

Verification Requirements of Preferences Categories:

In order to be eligible to apply and to qualify for the preference categories, sufficient documentation must be provided by the applicant prior to qualification. Applicants may provide additional documentation while on the waiting list that may improve their ranking.

Verification of involuntary displacement includes the following documentation:

- a. certification from a unit of government concerning displacement due to disaster,
- b. certification from a unit of government concerning displacement due to code enforcement or public improvement/development,
- c. certification from an owner concerning displacement due to owner action,
- d. certification from local police, social service agency, court, clergyman, physician, or public/private shelter/counseling facility concerning displacement due to domestic violence.
- e. certification by law enforcement agency concerning displacement to avoid reprisals for providing information on criminal activities.
- f. certification by law enforcement agency concerning displacement due to

hate crimes.

- g. certification by owner, social service agency, or physician concerning displacement due to the inaccessibility of the apartment unit.
- h. certification by HUD officials concerning displacement because of HUD disposition of multi-family project.

Further clarification of Involuntary Displacement: An applicant family who is evicted for reasons within their control is not considered displaced.

Verification of Substandard Housing includes the following documentation:

Includes certification from a unit of government or from the applicant's current landlord that the unit condition meets the definition of substandard. For "homeless families", verification is certification from a public/private facility providing shelter to the family, or from local police or a social service agency.

Further clarification of Substandard Housing: The definition of "substandard housing" is not restricted to units that have been condemned.

Verification of High Rent Burden includes the following documentation:

- a. Copies of a current lease agreement or suitable third-party verification through the landlord directly from the current leaseholder who is making application;
- b. The last three rent receipts, cancelled checks or money orders,
- c. Income will be verified in accordance with existing Contractor procedures used to verify income to determine eligibility and Total Tenant Payment.

An application is considered incomplete unless an applicant has provided social security cards for all household members 6 years or older. In addition, form HUD-9886(7/94) Authorization for the Release of Information/Privacy Act Notice must be signed by all family members 18 years of age or older.

Applicants who already reside in government assisted units will not be disqualified from applying for the City of Hartford waiting list. The applicant must meet the priority criteria or be able to demonstrate that their present subsidized housing conditions are not suitable.

Periodically the Contractor conducts mailings to purge inactive applicants from the waiting list. Applicants will be removed from the waiting list when they have not maintained a current mailing address with our office or when correspondence to them is unanswered. An exception will be when an applicant has demonstrated that they have a disability that prevented them from responding to our correspondence.

Prior to removing an applicant's name from the waiting list, we will examine the applicant's file to ensure that we have exhausted all reasonable means to contact them before we remove the applicant from the waiting list.

When it is determined that there are openings on the program, a letter is sent to the next eligible applicant from the waiting list regardless of the bedroom size that the applicant needs. The letter explains the papers needed in order to document eligibility, i.e., pay stubs, welfare budget sheets, social security award letters, savings account books, daycare receipts, etc. The family is assigned to a Program Supervisor who certifies the family's eligibility, conducts an orientation and issues the Housing Choice Voucher.

An applicant's income status may change while on the waiting list. Occasionally, a family who has been contacted for the purposes of enrollment may no longer meet the income eligibility requirements. When this happens, the reasons are fully explained by the Contractor's Program Supervisor at the time of the enrollment interview. Ineligible applicants may request an appeal with the Program Director for further clarification.

Applicants may obtain their numerical position on the waiting list by requesting it in writing or in person. The request must include the applicant's name, current address and social security number. All requests will be responded to in writing promptly. This waiting list information will not be provided to applicants via the telephone or in person for security concerns. Once on the waiting list, it is the applicant's responsibility to maintain their current address. Failure to do so may result in removal from the waiting list. Update of applicant's address must be done in writing or in person.

All vacant units from the Project-Based Assistance or Moderate Rehabilitation program will be listed as available to all qualified applicants of the City of Hartford waiting list. Project owners must select from applicants of the City of Hartford waiting list. All interested applicants will receive a referral letter to present to the project owner to confirm that they are qualified City of Hartford applicants. The project owner is responsible for screening applicants for suitability of tenancy.

Applicants who elect to accept a Mod Rehab unit are eligible to remain on the waiting list if they can still qualify for a ranking preference upon acceptance of the Mod Rehab units. Applicants who qualify to do this will maintain their original application date on the waiting list.

D. Verification of Income and Determination of Total Tenant Payment

Verification of income will be obtained by either third-party verification or using documentation provided directly by clients.

Accuracy of calculations of Total Tenant Payments is ensured through the following methods; computer software is programmed to make correct calculations of entered data. The Contractor has Program Supervisors who review calculations of all executed HAP contracts, as well as a random sampling of case files is audited to ascertain among other things that the Total Tenant Payment is calculated accurately.

Verification of income and determination of Total Tenant Payment will follow program regulations as identified in 24 CFR 813 with the following issues further defined:

1. Families or individuals claiming zero income will need to report income status quarterly.
2. All interim changes of family income or household composition must be reported to the housing agency as an interim reexamination. Interim reexamination will be processed for the next month in which the change became effective. If changes of income occur frequently, the housing agency reserves the right to review household income changes in terms of a yearly average so as to excuse program participants from excessive reporting.

E. Briefing of Families and Issuance of Housing Choice Voucher

If a person is determined to be eligible by the Contractor and is selected for participation, the applicant will be notified of an orientation meeting.

The applicant may be offered Housing Choice Voucher. When a family initially receives its Housing Choice Voucher, a full explanation of the following shall be provided to assist the family in finding a suitable unit and to apprise the family of its responsibilities and the responsibilities of the owner.

Full opportunity shall be provided to the families to ask questions and receive answers. The Housing Choice Voucher Holder's packet shall include the following:

1. A guide booklet to the Section 8 Tenant Based Assistance Housing Voucher program (Appendix II) which includes information pertaining to the following:
 - a. Term of the voucher and policy regarding extensions or suspensions.
 - b. How the housing assistance payment is calculated.
 - c. The Utility Allowance Schedule and information on the Fair Market and Payment Standard.
 - d. What the family should consider in deciding whether to lease a unit.
 - e. Informal hearing procedures.
 - f. Information on how to select unit similar to the HUD brochure on how to select

- a unit.
- 2. Mobility Program Notice explaining where a family may lease a unit.
- 3. The HUD-required "Lease Addendum".
- 4. The "Request for Lease Approval" form.
- 5. The policy on providing information about a family to prospective owners.
- 6. The subsidy standards.
- 7. The HUD lead-based paint (LBP) form.
- 8. Housing discrimination complaint form HUD-903 (2/89) and HUD 928.1 (3-89) form.
- 9. A listing of available apartment units. (Including handicap accessible units if applicable.)
- 10. A list of the obligations of being a participant of the Section 8 Tenant Based Assistance Housing Choice Voucher program and grounds for termination of assistance.
- 11. Protect Your Family From Lead In Your Home Booklet
- 12. Copy of Form Letter for Property Owners "Disclosure of Information on Lead-Based Paint Hazards.
- 13. Move-In Move-Out Checklist
- 14. Owner Certification of Rent Reasonableness

Information is provided to prospective owners regarding participating families in the following manner; upon request the Contractor will give prospective owners the family's current address and if known, the name and address of the owner at the family's current and prior address.

The Contractor may also provide any tenancy history that involves eviction action initiated against the family. Or information pertaining to damage, vacancy and unpaid rent claims paid out on behalf of the family.

After the Voucher has been issued to the applicant, the Request for Lease Approval and prohibited Lease provisions are made available to the tenant or landlord on request or when necessary. Instead of handing out these forms routinely, the Contractor has developed a model lease for use by landlords and tenants. This model lease abides by the prohibited lease provisions and most landlords make use of it, although it is not required. This has helped the Contractor to eliminate, when appropriate the additional burden on the tenant of completing the request for lease approval with the potential landlord and presenting the form to the Contractor. The essential information can instead be provided by telephone or in person.

If families believe that they have been discriminated against on the basis of race, color, national origin, sex, disability, or familial status, the Contractor will offer to assist them in filling out HUD form 903 (Housing Discrimination Compliant form). We will also will forward Housing Discrimination Compliant form immediately to the Department of Housing

and Urban Development Regional Office in Boston. The will be informed of other available option in which to pursue a discrimination complaint including an appropriate referral to the State Commission on Human Rights and Opportunities, the Connecticut Fair Housing Center and Statewide Legal Services of CT.

F. Expiration and Extension of Housing Choice Voucher

The Housing Choice Voucher shall expire at the end of sixty (60) days unless within that time the family locates an apartment unit. The inspection of the apartment need not occur prior to Housing Voucher expiration but must occur within a reasonable time period.

If the Housing Voucher expires or is about to expire, a family may submit the Housing Voucher to the Contractor with a request for an extension. If the applicant has demonstrated a good faith effort to secure an apartment unit, the Contractor may grant one or more extensions not to exceed a total of sixty (60) days, provided the Contractor determines that the family's failure to find a suitable unit is not due to the fault or lack of diligence of the family.

The Housing Voucher holder may request that the expiration period of their Housing Voucher be suspended. To be eligible for consideration the request must be for a documented medical reason or for a family emergency nature to justify the inability of the participant to make use of the Housing Voucher during that time period. Request will be reviewed on a case by case basis. The suspension request can not exceed 120 days.

G. Subsidy Standards

To avoid overcrowding and prevent waste of space and program funds, units shall be leased in accordance with the subsidy standards set below.

The family's unit size shall be determined using the following criteria:

1. The bedroom size assigned shall provide for the smallest number of bedrooms needed to house a family without overcrowding.
2. The bedroom size assigned shall not require more than two persons to occupy the same bedroom.
3. The bedroom size assigned shall not require persons of the opposite sex other than a adult couple to occupy the same bedroom with the exception of infants and very young

children.

4. The bedroom size assigned may be increased to a larger size than the family would ordinarily need if there is a documented medical reason that adequately supports the need for a larger size unit.
5. The family has the option to select a smaller-sized unit provided there is at least one bedroom of appropriate size for each two persons in the household. (For example, a two-bedroom voucher holder with a mother with an infant may select a one-bedroom unit.) For the Voucher Program, the payment standard that is used for the family will be the lower of the subsidy standard that the family qualifies for or the payment standard for the unit rented by the family.
6. Provided there is adequate documentation, a child who is temporarily away from the house because of placement in foster care will be considered a member of the family for purposes of determining the family unit size.
7. A pregnant woman will be treated as a two-person family.

<u>Number of Bedrooms</u>	<u>Number of Persons</u>	
	<u>Minimum</u>	<u>Maximum</u>
0	1	1
1	1	2
2	2	4
3	3	6
4	5	8
5	8	10

H. Housing Quality Standards and Inspections

The Contractor will use the guidelines delineated in 24 CFR 982.401 as the appropriate Housing Quality Standards.

Before approving a lease, the Contractor shall inspect the unit for compliance with the Housing Quality Standards. The inspection will be made as quickly as possible, but no later than ten (10) days after the owner's request.

If there are violations that must be corrected in order for the unit to be decent, safe and sanitary, the Contractor will advise both the owner and tenant of the work required to be done. The unit will be reinspected to ascertain that necessary work has been performed

and that the unit meets the Housing Quality Standards before a contract is executed. The Assistant Director maintains a report to monitor Housing Quality Standards violations and the noncompliance sanctions.

Disapproval of Owner

The Contractor reserves the right to deny approval to lease a unit from an owner for any of the following reasons:

1. The owner has violated obligations under a housing assistance payment contract under Section 8 of the 1937 Act.
2. The owner has committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing programs.
3. The owner has engaged in drug-trafficking.
4. The owner has a history or practice of noncompliance with the HQS for units leased under the tenant-based programs or with applicable housing standards for units leased with project-based Section 8 assistance or leased under any other federal housing programs.
5. The owner has a history or practice of failing to terminate tenancy of tenants of units assisted under Section 8 or any other federally assisted housing program for activity by the tenant, any member of the household, a guest or another person under the control of any member of the household that: (i)Threatens the right to peaceful enjoyment of the premises by other residents; (ii)Threatens the health or safety of other residents, of employees of the PHA, or of owner employees of the PHA or of owner employees or other persons engaged in management of the housing; (iii)Threatens the health or safety of, or of owner employees or other persons engages in management of the housing; (iv)Is drug-related criminal activity or violent criminal activity.
6. The owner has a history or practice of renting units that fail to meet State or local housing codes.
7. The owner has not paid State or local real estate taxes, fines or assessments.

Lease Approval and Housing Assistance Payments Contract Execution

The Contractor shall forward to the City of Hartford Department of Housing and Community Development all contracts for initial execution. The Contractor will execute contract renewals.

Security Deposit

There is no limit on the amount of security deposit that owners can collect Housing Choice Voucher tenants other than what Connecticut State law imposes (i.e. two month's rent unless the tenant is 55 years of age or older than the amount is one month's rent).

Payment Standards

The Contractor will set up an applicable payment standard schedule for each bedroom size

in accordance with HUD regulations. The Contractor may establish an adjustment standard schedule on an annual basis in order to assure continued affordability for participating families. The following factors will be considered in the assessment of the adequacy of the payment standard: Success rates of program participants, rent burdens of program participants, rent survey data, availability of greater housing choices.

Review and Adjustment of Allowances for Utilities

The Contractor shall at least annually determine whether there has been a substantial change in utility rates or other charges of general applicability and whether an adjustment is required in the allowance for utilities and other services by reason of such change or because of errors in the original determination. The procedure for this determination shall be as follows:

The Contractor will request estimates and actual data from utility companies, heating companies and program participants. Utility Allowance schedules may be collected from other housing authorities in region to review ongoing rates currently in use. After reviewing the aforementioned data decisions will be made to determine if utility allowance schedule needs to be adjusted. If the Contractor determines that an adjustment should be made, the Contractor shall make the necessary adjustments taking into account the size of dwelling units and other pertinent factors.

I. Payment to Owners

The Contractor's staff submits the applicable HUD form to the accounting staff, which processes the information in the computerized payment system. The Contractor also has written Program Controls which were developed to minimize exposure to abuse of the Section 8 Tenant Based Assistance, Housing Choice Voucher funds by staff, landlords and tenants, and to maintain the integrity of the program data (see Appendix III for Program Controls).

J. Review of Family Circumstances, Rents, Utilities and Housing Quality Standards.

The Contractor's Director or Assistant Director of the program assigns annual re-examinations two months prior to each lease anniversary date, based on a computer generated monthly report intended for such purposes. The Contractor's Program Representatives thereby have sufficient opportunity to notify, in writing, both the owner and the tenant. Should either party have issues to resolve, there is then adequate time to explore the issues, and to work toward their resolution prior to the expiration of the lease.

Changes in tenant income are processed upon verification throughout the lease term. All tenants who report zero income are asked to certify their income status at least every three

months.

As detailed above, the Contractor will assign new cases, as well as annual recertifications, to Program Representatives. The Program Representative inspects as well as determines tenants continued eligibility and payment amounts.

Reinspection is done as required by the Program Representative or as requested by the tenant or owner.

At annual reinspections or during the lease term, should the apartment fail an inspection, the following will occur:

1. The owner is notified in writing as to the deficiencies. The owner is given a time period, determined by the Program Representative in which to make the necessary repairs. If the deficiencies are serious the family is issued a new Voucher and advised to relocate. The Assistant Director will maintain a report to monitor HQS violations and the noncompliance sanctions.
2. Program Representatives may abate all or part of the housing assistance payment if the owner is failing to supply contracted services. The Program Representative may hold the housing assistance payment until the repairs are made. If the repairs are made within the specified time, the payment will be released.
3. If the repairs are not made, the Program Representative may continue to withhold payments, abate the payments, or notify the owner of the termination of the contract, and issue the tenant a Housing Voucher. The participating family will be reinstated on the program when another apartment is secured and satisfactorily passes inspection within the time prescribed on the Housing Voucher.

The Assistant Director maintains a record of all requested repairs. The completion dates are monitored monthly to ensure that reinspection deadlines are met or if not, then the appropriate administrative sanctions are taken. Before monthly housing assistance payments are made, all repairs that are requested are reviewed to ensure that the Program Representatives follow through on administrative sanctions. In the instance where monies need to be recovered from participating families or program landlords, the attached Program Controls (Appendix III) should outline HA policy on this matter.

Family Break-up

In the event that a family break-up occurs in an assisted household, the Contractor will review the following factors to determine which members of the family continues to receive assistance in the program:

1. What is in the best interest of minor children or ill, elderly or disabled family members.

2. Whether family members are forced to leave the unit as a result of actual or threatened physical violence against family members by a spouse or other member of the household.
3. Which family member has recognized custody of minor children in family.

Absence from Unit

The family may be absent from the unit for brief periods. For longer absences the following HA policy shall apply:

Absence is defined as no family member residing in the unit.

Family members need to notify the Contractor of any extended absence from the unit and the reason for the absence. The Contractor may require the family to document the reason for the extended absence. In any event, family members may not be absent from the unit for a period of more than 60 consecutive calendar days.

Housing Assistance Payments terminate if the family is absent for longer than the maximum period permitted. The term of the HAP Contract and the assisted lease also terminate.

The Contractor reserves the right to consider special circumstances (such as absence due to hospitalization, medical emergency, etc.) as a basis to determine whether the Contractor may want to allow a resumption of assistance to the family. The family must supply any information requested by the Contractor to verify the special circumstances.

The Contractor conducts a random mailing to a sample of all program participants to verify continued occupancy. The random mailing is described more fully in the Program Controls document.

K. Termination Policy and Procedure

The following will constitute grounds for removal of a tenant from the Housing Choice Voucher programs or deny assistance for an applicant:

1. Failure to make payments for monies owed the HA or another HA.
2. Violation of any of the family obligations under 24 CFR 982.551.
3. A participant or family member engaged in drug-related criminal activity or violent criminal activity.
4. A participant has committed fraud (bribery or any other corrupt or criminal act) at the time of application or during assisted tenancy.
5. A participant has failed to comply with the requirements under the family's contract of participation in the Family Self-Sufficiency program.
6. If any family members of the family has been evicted from public housing.

7. If the family has engaged in or threatened abusive or violent behavior toward HA personnel.

Procedure for removing a Section 8 tenant from the program:

1. The tenant and landlord will be mailed a notice of intent to terminate Section 8 benefits. The notice shall state the grounds for removal. It shall advise the tenant that they have 10 days in which to respond and contest the action by requesting a hearing.
2. The tenant may have an advocate or attorney present at the hearing.
3. If the tenant does not respond, they may be automatically removed from the program effective the first day of the month coming after the date of the notice. Notice of termination will be sent to the tenant and landlord simultaneously.

L. Complaints and Appeals

Informal Hearings for Applicants

The Contractor will provide an applicant an opportunity for an informal review of a decision denying an applicant:

1. listing on the waiting list, and/or
2. participation in the program.

The Contractor shall give the applicant written notification of its decision denying assistance. The notice shall:

1. be given personally to the applicant or member of the family or sent by first class mail to the last known address;
2. give a brief statement of the reasons for the decision, and
3. inform the applicant that within ten (10) days of the date of the notice, the applicant may request, in writing, that an informal hearing be held to present objections and review the decision.

Informal Hearing for Participants

The Contractor will provide an opportunity for an informal hearing to a participant to consider whether decisions made against participants are in accordance with HUD regulations and the Contractor rules in the following situations:

1. A determination of the amount of total tenant payment or tenant rent. This requirement does not apply to utility allowance schedules.
2. A decision to deny or terminate assistance.

3. A determination that a participant is residing in an overcrowded or under utilized unit.
4. In the case of a participant who wants to move to another dwelling unit a determination of the number of bedrooms to be entered on a voucher when a participant family desires to move to another unit.

In the case of a decision to deny or terminate assistance, the Contractor shall give the applicant written notification of its decision denying or terminating assistance. The notice shall:

1. be given personally to the applicant or member of the family or sent by first class mail to the last known address;
2. give a brief statement of the reasons for the decision, and
3. inform the applicant that within ten (10) days of the date of the notice, the applicant may request, in writing, that an informal hearing be held to present objections and review the decision.

Conduct of Hearings

If an applicant or participant requests an informal hearing within the time frame set forth above, the HA shall conduct a hearing in accordance with the following procedures:

1. The Contractor shall appoint a hearing officer to conduct the hearing who must be an employee or outside person other than the person who made or approved the decision under review or a subordinate of such person.
2. The hearing officer shall issue a written decision stating briefly the factual and other basis for the decision, a copy of which shall be furnished promptly to the applicant.